

### **REMARKS**

Claims 1, 4-5, 7-9, 12-13, 15-24 are pending in the application. Claims 2, 3, 6, 10, 11 and 14 were canceled. Claims 1 and 9 were amended to more particularly point out and distinctly claim the present invention. Claims 17-24 have been added to further define the present invention. Support for the claim amendments and for the new claims can be found throughout the specification and at least on the following pages: page 13, lines 22-24; page 14, lines 7-8 and 24-27; page 18, lines 24-26; page 19, lines 21-23; and pages 30-46, of the specification in combination with the figures referred to therein. Therefore, no new matter has been added.

For at least the reasons set forth below, withdrawal of all outstanding rejections is respectfully requested.

### **Prior Art Rejections**

Claims 1-2, 4-6, 9-10 and 12-14 were rejected under 35 U.S.C. 102(a) as being anticipated by Hiroaki (Japanese Publication Number 2001-018492) (hereinafter Hiroaki).

Claims 3, 7-8, 11 and 15-16 are rejected under 35 U.S.C. 103(a) as being unpatentable over Hiroaki (Japanese Publication Number 2001-018492) (hereinafter Hiroaki) as applied to claims 1 and 9 above, and further in view of Hosoda et al. (U.S. Patent Number 6,914,687 B1) (hereinafter Hosoda).

Applicants respectfully traverse these rejections as they relate to the amended set of claims for at least the following reasons set forth below.

#### **1. Patentability of amended independent claims 1 and 9 over Hiroaki in view of Hosoda et al.**

Claim 1 reads as follows (underlining added for emphasis)

1. An image forming system comprising:  
a host having a communication function unit; and  
an image forming apparatus having a first communication unit, a second communication unit, and a relay unit,  
wherein said first communication unit communicates data with said communication function unit via said relay unit in a first page description language (PDL) and said second communication unit communicates the

data with said communication function unit via said relay unit in a second PDL different from the first PDL.

Claim 9 reads as follows (underlining added for emphasis)

9. An image forming apparatus comprising:  
a relay unit to which a host, a first communication unit, and a second communication unit are connected;  
said first communication unit which communicates data with said host via said relay unit in a first page description language (PDL); and  
said second communication unit which communicates the data with said host via said relay unit in a second PDL different from the first PDL.

In the outstanding Office Action, the Examiner admits that Hiroaki does not disclose the limitations of claims 3 and 11, now incorporated into claims 1 and 9 respectively, with the additional limitation that the second PDL is different from the first PDL. Instead, on page 7 of the outstanding Office Action, the Examiner relies upon column 12, lines 4-10 of Hosoda et al. as disclosing a first communication unit that communicates in a first PDL and a second communication unit that communicates in a second PDL, wherein it is “inherent to have PDL language for both communication means as long as the printer and host are communicating.” Applicant respectfully traverses the Examiner’s reliance upon Hosoda et al. as disclosing the use of two different PDL’s. The text portion of Hosoda et al. highlighted by the Examiner reads as follows (underlining added for emphasis):

In FIG. 6, reference numeral 2101 denotes an application unit, with which a user generates desired printing data by operating a graphic user interface. Reference numeral 2102 denotes a printer driver unit, which converts image data prepared by the application unit 2101 to page descriptive language (hereinafter abbreviated as PDL) data that can be printed by the image recording apparatus 102.

This text portion does not disclose or suggest two separate page description languages (PDL’s). Only one PDL is referred to in the text cited. Also, the remaining text portions of Hosoda et al. refer only to “PDL data.” In addition, the meaning of the Examiner’s statement that it is “inherent to have PDL language for both communication means as long as the printer and host are communicating” is not understood. Specifically, it is not understood what the two

communications means refer to. Furthermore, even if there are two communication means, there is no disclosure or suggestion in Hosoda et al. that the communication would occur using two different PDL's. In fact, absent any discussion to the contrary, an artisan would presume that if data needs to be communicated via multiple communication means, the format of the data would be the same. Alternatively, if the Examiner believes the two communication means refer to a first communication means for communicating from a printer to a host and the second communication means for communicating from a host to a printer, again there is no reason why the bidirectional process would inherently use two different PDL's.

Applicant respectfully disagrees with the Examiner that it is inherent to have a first communication unit communicating data with the communication function unit via the relay unit in a first PDL language and a second communication unit communicating the data with the communication function unit via the relay unit in a second PDL language different from the first PDL language. Hosoda et al. does not disclose, teach or suggest the present invention. Hosoda et al. makes no suggestion of an apparatus that is able to distinguish the kind of PDL language and process a first PDL language and a second PDL language that is different from the first.

In Hosoda et al., a job packet is generated from the PDL language stored in the transmission buffer. It is not inherent that this includes a first communication unit communicating data with the communication function unit via the relay unit in a first PDL language and a second communication unit communicating the data with the communication function unit via the relay unit in a second PDL language different from the first PDL language. There is no mention or inherent teaching in Hosoda et al. of more than one PDL being communicated.

Accordingly, Hiroaki and Hosoda et al. do not disclose or suggest, either alone or in combination, a first communication unit communicating data with the communication function unit via the relay unit in a first PDL language and a second communication unit communicating the data with the communication function unit via the relay unit in a second PDL language different from the first PDL language. Further, neither Hiroaki nor Hosoda et al. inherently disclose or suggest a first communication unit communicating data with the communication function unit via the relay unit in a first PDL language and a second communication unit

communicating the data with the communication function unit via the relay unit in a second PDL language different from the first PDL language because they do not exist in either reference.

Each of the independent claims distinguishes over Hiroaki based on at least the features underlined above. In view of the foregoing, withdrawal of the rejections of independent claims 1 and 9 is respectfully requested.

2. Patentability of dependent claims

All of the rejected dependent claims and the new dependent claims 17-24 are patentable over Hiroaki whether taken alone or in combination with Hosoda et al. for at least the reason that they are dependent upon the independent claims, and because they each recite additional patentable features.

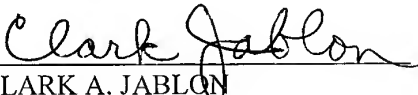
**Conclusion**

Insofar as the Examiner's rejections were fully addressed, the instant application including all pending claims is in condition for allowance. A Notice of Allowability of all pending claims is therefore earnestly solicited.

Respectfully submitted,

YUKIHIRO SAIDA

January 7, 2008  
(Date)

By:   
CLARK A. JABLON  
Attorney for Applicant  
Registration No. 35,039  
PANITCH SCHWARZE BELISARO  
& NADEL LLP  
One Commerce Square  
2005 Market Street  
Philadelphia, PA 19103-7013  
Telephone: 215-965-1330  
Direct Dial: 215-965-1293  
Facsimile: 215-965-1331  
E-Mail: cjablon@panitchlaw.com

CAJ/DRM/lis